

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

JANE DOE,)	
)	
Jane Doe,)	
)	
v.)	Case No. 3:23-cv-00018-RSB
)	
RECTOR AND VISITORS OF THE UNIVERSITY OF VIRGINIA,)	
)	
Defendant.)	
)	

DECLARATION

I, Akia Haynes Hale, pursuant to 28 U.S.C. § 1746, hereby declare and state as follows:

1. I am over the age of eighteen, and I am competent to testify to the matters described in this Declaration. Unless otherwise indicated, I have personal knowledge of the facts and statements in this Declaration and am prepared to testify to them, among other things, at a hearing or trial related to this matter or the issues or facts discussed in this Declaration.

2. I am a former employee of the University of Virginia (“UVA”). I began my employment at UVA in 2016. In March 2020, I held the position of Deputy Title IX Coordinator. In November 2020, I became the Interim Title IX Coordinator and served in that role through October 2021 when I left UVA for a new position.

3. I was familiar with UVA’s Policy on Sexual and Gender-based Harassment and Other Forms of Interpersonal Violence (“Title IX Policy”) while I was employed at UVA.

4. I am aware of the true identities of the Plaintiff, Jane Doe, and the former UVA professor referred to as John Roe in the above-styled lawsuit.

5. I am familiar with the Title IX investigation that is the subject of the above-styled lawsuit.

6. John Roe contested the recommended findings against him in the Final Investigation Report.

7. Pursuant to UVA's Title IX Policy when one party contested the recommended findings in a Final Investigation Report, UVA convened a Review Panel with three faculty members, and a non-voting chair.

8. On May 27, 2021, I notified Jane Doe and John Roe that there would be a Review Panel Meeting on July 1, 2021, and that this would be a remote hearing held on Zoom. The attorney advisors for Jane Doe and John Roe were not available for earlier dates that the Title IX Office offered.

9. On August 6, 2021, I sent Jane Doe and John Roe the final decision letter from Executive Vice President and Provost M. Elizabeth Magill that affirmed the findings of the Review Panel and imposed sanctions for John Roe.

10. On August 6, 2021, I sent Plaintiff a letter informing her that UVA would reimburse her for out-of-pocket expenses up to \$5,000 incurred between March 31, 2020 and December 31, 2021 for counseling and holistic healing services.

11. On August 10, 2021, UVA, through Jenna Pritchett, provided Jane Doe with information about how UVA could assist her in obtaining reimbursements for out-of-pocket expenses. UVA informed Plaintiff that it could directly pay a counselor or vendor of healing services if she preferred that to being reimbursed for out-of-pocket expenses.

12. I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 24, 2024.

A handwritten signature in blue ink, consisting of stylized, overlapping loops and curves, positioned above a horizontal line.

Akia Haynes Hale